

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

DISABILITY RIGHTS RHODE
ISLAND,

Plaintiff

v.

KATELYN MEDEIROS in her official
capacity as Acting Child Advocate,
THE OFFICE OF THE CHILD
ADVOCATE,

Defendant.

C.A. NO. 1:24-cv-00101-WES-PAS

DISMISSAL STIPULATION

By agreement of the parties, this matter may be dismissed without prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

The parties acknowledge that:

1. Plaintiff Disability Rights Rhode Island (“DRRI”) is currently the designated Protection and Advocacy system (P&A) in Rhode Island.
2. In its capacity as the P&A, DRRI received a complaint regarding abuse and neglect at St. Mary’s Home for Children, and subsequently opened an investigation into the allegations.
3. DRRI requested from the Office of the Child Advocate (“OCA”) a copy of its December 19, 2023, report regarding the OCA’s investigation into St. Mary’s Home for Children. The OCA produced a copy of the report to DRRI, with the names of

youth, St. Mary's staff, and individuals who reported allegations of abuse or neglect redacted.

4. DRRI requested an unredacted copy of the report from the OCA. The parties recognize that the unredacted report is confidential pursuant to R.I. Gen. Laws § 42-73-10, and per state law, can only be released by the OCA pursuant to an order from the Family Court. However, the parties further recognize that DRRI, as the P&A, is entitled to access the confidential information in this report pursuant to the Protection and Advocacy for Individuals with Mental Illness Act ("the PAIMI Act"), 42 U.S.C. §§ 10801 *et seq.*, the Developmental Disabilities Assistance and Bill of Rights Act ("the DD Act"), 42 U.S.C. §§ 15001 *et seq.*, and the Protection and Advocacy of Individual Rights Program ("the PAIR Act"), 29 U.S.C. § 794e..

The parties agree that they shall bear their own attorneys' fees and costs.

This 15th day of April, 2024.

Respectfully submitted,

/s/ Kristine L. Sullivan

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